

11/16/15

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Received & Inspected

NOV 27 2015

FCC Mail Room

**Re: Mezmo Corporation, Motion to Lift Suspension—CG Docket No. 03-123**

Dear Ms. Dortch,

Please find attached Mezmo Corporation's Motion to Lift Suspension.

Sincerely,



Cristina Duarte  
Senior Regulatory Affairs Manager  
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**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of	)	CG Docket No. 13-24
	)	
Misuse of Internet Protocol (IP)	)	CG Docket No. 10-51
Captioned Telephone Service	)	
	)	CG Docket No. 03-123
	)	

**MOTION TO LIFT THE SUSPENSION OF INNOCAPTION'S TEMPORARY  
CERTIFICATION**

Pursuant to 47 C.F.R. § 1.41, Mezmo Corporation (previously InnoCaption Inc.) ("InnoCaption") submits this motion to request the Federal Communications Commission ("Commission") to lift the suspension of InnoCaption's conditional certification to provide Internet Protocol Captioned Telephone Services (IP CTS) be lifted.

In an order adopted on April 7, 2015, the Commission suspended InnoCaption's conditional certification to provide IP-CTS for failure to comply with TRS mandatory minimum standards. The order stated certain conditions required to be met for the Commission to lift the temporary suspension. Per the Order, InnoCaption was required to: (1) implement a compliant emergency handling solution; (2) establish a comprehensive compliance plan; and (3) provide the Commission monthly updates regarding InnoCaption's progress. In response to the Order, InnoCaption complied with all the requirements in a timely manner as set forth in the Order of Suspension and relies on the following facts as a basis for its assertion.

Prior to the FCC official order of suspension, InnoCaption had voluntarily suspended service and appointed a new Compliance Officer to serve as the point of contact for the Commission. Following the official suspension, InnoCaption contracted with a third party company to implement a compliant emergency handling solution. With the assistance of a local Public Safety Answering Point (PSAP), InnoCaption and the third party company tested the emergency handling solution on multiple occasions to identify potential issues and implement solutions to those issues. The solution implemented provides the appropriate PSAP with the user's name, caption call-back number, and location with the assistance of the third party company. InnoCaption filed a Petition for Waiver with the Commission on July 1, 2015 to request the Commission waive the requirements of providing the PSAP with the Communications Assistant's (CA) number and call back number. In the event a user is unable to provide their location, the Emergency Call Relay Center Operator ("Operator") is able to place the caller on a brief hold to get the location information. If the Commission grants InnoCaption's petition for waiver, the implemented solution complies with Commission rules, and goes beyond what the rules currently require by providing a means to obtain the user's location in the event the user is unable to provide it.

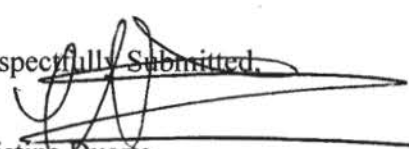
On September 15, 2015, InnoCaption provided written notification to the Commission that the new emergency handling solution was ready for Commission testing. This notification represented the completion of the last of the orders conditions prior to the six-month deadline. The Commission officially tested InnoCaption's emergency handling solution on October 21, 2015.

InnoCaption entered into a Consent Decree with the Enforcement Bureau on September 24, 2015. The consent decree contains a comprehensive compliance plan, and reporting requirements as required by the order of suspension. Additionally, InnoCaption has already reimbursed the TRS fund for monies received and paid the civil penalty established by the Consent Decree. Lastly, InnoCaption has kept the Commission informed during this period of suspension. The Disability Rights Office (DRO) was apprised monthly regarding InnoCaption's progress in implementing a compliant emergency handling solution.

### CONCLUSION

InnoCaption was officially suspended as an IP CTS provider on April 7, 2015. During the period of suspension, InnoCaption has implemented an emergency handling solution which goes beyond what the rules currently require, entered into a Consent Decree with the Enforcement Bureau, and frequently updated the Commission regarding its progress. Contingent on the results of the Commission's official testing of InnoCaption's emergency handling solution, and the Commission approving the submitted Petition for waiver, InnoCaption respectfully requests the Commission lift the suspension of InnoCaption's conditional certification to provide fund-supported IP CTS services.

Respectfully Submitted,

  
Cristina Duarte

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**DECLARATION UNDER PENALTY OF PERJURY OF CRISTINA DUARTE**

I swear under penalty of perjury that I am Cristina Duarte, Senior Regulatory Affairs Manager, an officer of the above-named applicant, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as documentation contained in this submission, are true, accurate, and complete.

/s/ Cristina Duarte

Cristina Duarte

November 16, 2015